

FILED AH

UNITED STATES DISTRICT COURT

for the
Eastern District of Virginia
Alexandria Division

2020 MAR 27 P 3:49

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIARukminesh Mehta

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Patrick Morrissey et al.,

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

1:20cv342 CLOG/TLB
(to be filled in by the Clerk's Office)

Jury Trial: (check one)



Yes



No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Rukminesh Mehta2624 Iron Forge RoadHerndon, FairfaxVirginia 20171(571) 524-2777rukminesh.c.mehta@criminologicalpsychology.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Patrick Morrissey
Attorney General
State Capital Complex, Bldg-1, Rm E-26
Charleston, Kanawha
West Virginia 25305
(304) 558-2021

Defendant No. 2

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Puja Shah
8813 Saunders Lane
Bethesda, Montgomery
Maryland, 20817
(202) 557-6710

Defendant No. 3

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Franklin Austin
CPA
1556 Kanawha Blvd East
Charleston, Kanawha
West Virginia, 25311
(304) 344-2727
FrankAustin@austincpaac.com

Defendant No. 4

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Joseph Reeder
Circuit Court Judge
12093 Winfield Road
Winfield, Putnam
West Virginia, 25213
(304) 586-0262

Defendant No. 5

Name: Sanjit Shah

Jobor Title

Street Address: 8813 Saunders Lane

City and County: Bethesda, Montgomery

State and Zip Code: Maryland, 20817

Telephone: (301) 529-4030

Email: sanjitheman@gmail.com

Defendant No. 6.

Name: Susan Perry

Jobor Title: Judge

Street Address: 75 E 2nd Ave #327

City and County: Williamson, ~~W~~ Mingo

State and Zip Code: West Virginia, 25661

Telephone: (304) 235-6007

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Fraud, Obstruction of Justice, Deceit, Forgery, Cheating, False Pretense, False Statements, Violation of Civil Rights, Violation of Fourth Amendment by way of Due Process Clause of 14th Amendment, Violation of Property Rights, Expectations of Privacy

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Rukminesh Mehta, is a citizen of the State of (name) Virginia.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) Patrick Morrissey, is a citizen of the State of (name) West Virginia. Or is a citizen of (foreign nation) _____.

2. The Defendant(s)

- 2.1 The defendant, Pujia Shah, is a citizen of the State of Maryland
- 2.2 The defendant, Franklin Austin is a citizen of the State of West Virginia
- 2.3 The defendant, Joseph Reeder is a citizen of the State of West Virginia
- 2.4 The defendant, Sanjit Shah is a citizen of the State of Maryland
- 2.5 The defendant, Susan Perry is a citizen of the State of West Virginia

b. If the defendant is a corporation

The defendant, (name) Puja Shah, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Actual Damages are approximately \$1,910,000.00, Legal Fees, and Expenses paid are around \$300,000, and these amounts are also what is owed, to some degree, not including, Interest and Penalties

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Puja Shah and Sanjit Shah, 2008 Dec, Filing Falseified Taxes in Plaintiff's name, taking out Mortgages, Car loans, Credit cards, etc using Name of Plaintiff and his SSN.
Frank Austin, CPA, 2008, 2009, 2010, 2011, 2012, 2013, 2014: Knowingly Filing Tax Returns in Virginia, knowingly, knew documents were fraudulent. -Bodrick Morrissey, interviewed, personally, helping Frank Austin, to continue fraudulent activities. Joseph Rader and Susan Berry falsified Court Records, Destroyed Court Records etc.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Wrongs are still continuing to this day; \$4 million worth of Mortgages in my name, \$300,000+ paid in Fees, Penalties, Legal, etc, due to this Fraud, which still continues.
Frank Austin, CPA, Fees, Direct Damages due to Fraudulent Court Files, Court Files Destroyed/covers up, damages of \$2,000,000+, not including interest penalties

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

willful misconduct, violation of civil rights, punitive damages, and emotional distress, 8 1/2 years of seeing my child suffer, suffer from physical child Abuse, \$250,000,000

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

03/27/2020

Signature of Plaintiff

Rukminesh Mehta

Printed Name of Plaintiff

Rukminesh Mehta

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address